UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NEW YORK	
DAVID L. REID, MICHAEL PALMERI, and DAVID RICOTTA	SPECIAL VERDICT SHEET 15-CV-1078(JJM)
Plaintiffs,	*
v. COUNTY OF ERIE,	
Defendant.	
	,
1. Did Plaintiff David Reid engage in an ε	activity protected by federal law?
Yes No	
At least five jurors must agree and sign his.	/her name below.
1	
If five of six jurors answered, "Yes," ther	n proceed to Question 2; otherwise, please proceed to
Question 8.	, , , , , , , , , , , , , , , , , , ,
2. Did Defendant County of Erie know Pla	aintiff David Reid was engaged in this activity?
Yes No	
At least five jurors must agree and sign his	/her name below.
1-040-041-041-1	

Case 1:15-cv-01078-JJM Document 94 Filed 04/11/19 Page 2 of 10

If five of six jurors answered, "Yes," then proceed to Question 3; otherwise, please proceed to

Question 8.	
3. Did Defendant County of Erie take an adverse employment action against Plaintiff David Reid	?
Yes No	
At least five jurors must agree and sign his/her name below.	
If five of six jurors answered, "Yes," then proceed to Question 4; otherwise, please proceed to Question 8.	0
4. Was there a causal connection between the protected activity and the adverse employmen action?	ıt
Yes No	
At least five jurors must agree and sign his/her name below.	
If five of six jurors answered, "Yes," then proceed to Question 5; otherwise, please proceed to Question 8.	Ю.
5. Did Defendant County of Erie articulate a legitimate, non-retaliatory reason for taking the adverse employment action against Plaintiff David Reid?	ıe
Yes No	

Case 1:15-cv-01078-JJM Document 94 Filed 04/11/19 Page 3 of 10

At least five jurors must agree and sign his/her name below.
If five of six jurors answered, "Yes," then proceed to Question 6; otherwise, please proceed to Question 7.
6. Did Plaintiff David Reid sufficiently show the non-retaliatory reason was false and retaliation was the real motive for taking the adverse employment action against him?
Yes No
At least five jurors must agree and sign his/her name below.
If five of six jurors answered, "Yes," then proceed to Question 7; otherwise, please proceed to Question 8.
7. What is the amount of non-economic damages, if any, suffered by Plaintiff David Reid directly caused by the adverse employment actions taken by Defendant County of Erie in retaliation of Plaintiff David Reid engaging in a protected activity?
\$
At least five jurors must agree and sign his/her name below.
Once five of six jurors have agreed to the amount of the damage award, then proceed to Question

8.

Case 1:15-cv-01078-JJM Document 94 Filed 04/11/19 Page 4 of 10

8. Did Plaintiff Michael Palmeri engage in an activity protected by federal law?
<u>X</u> Yes No
At least five jurors must agree and sign his/her name below.
If five of six jurors answered, "Yes," then proceed to Question 9; otherwise, please proceed to Question 16.
9. Did Defendant County of Erie know Plaintiff Michael Palmeri was engaged in this activity? Yes No
At least five jurors must agree and sign his/her name below.
If five of six jurors answered, "Yes," then proceed to Question 10; otherwise, please proceed to Question 16.
10. Did Defendant County of Erie take an adverse employment action against Plaintiff Michael Palmeri?
Yes No

Case 1:15-cv-01078-JJM Document 94 Filed 04/11/19 Page 5 of 10

At least five jurors must agree and sign his/her name below.
ų. V
•
If five of six jurors answered, "Yes," then proceed to Question 11; otherwise, please proceed to Question 16.
11. Was there a causal connection between the protected activity and the adverse employment action?
YesNo
At least five jurors must agree and sign his/her name below.
If five of six jurors answered, "Yes," then proceed to Question 12; otherwise, please proceed to Question 16.
12. Did Defendant County of Erie articulate a legitimate, non-retaliatory reason for taking the adverse employment action against Plaintiff Michael Palmeri?
Yes No
At least five jurors must agree and sign his/her name below.
If five of six jurors answered, "Yes," then proceed to Question 13; otherwise, please proceed to Question 14.

Case 1:15-cv-01078-JJM Document 94 Filed 04/11/19 Page 6 of 10

13. Did Plaintiff Michael Palmeri sufficiently show the non-retaliatory was both false and retaliation was the real motive for taking the adverse employment action against him?
Yes No
At least five jurors must agree and sign his/her name below.
If five of six jurors answered, "Yes," then proceed to Question 14; otherwise, please proceed to Question 16.
14. What is the amount of economic damages, if any, suffered by Plaintiff Michael Palmeri directly caused by the adverse employment actions taken by Defendant County of Erie in retaliation of Plaintiff Michael Palmeri engaging in a protected activity?
\$
At least five jurors must agree and sign his/her name below.
Once five of six jurors have agreed to the amount of economic damages to be awarded, the
proceed to Question 15.
15. What is the amount of non-economic damages, if any, suffered by Plaintiff Michael Palmer directly caused by the adverse employment actions taken by Defendant County of Erie is retaliation of Plaintiff Michael Palmeri engaging in a protected activity?
$oldsymbol{\Phi}$

Case 1:15-cv-01078-JJM Document 94 Filed 04/11/19 Page 7 of 10

At least five jurors must agree and sign his/her name below.
4
Once five of six jurors have agreed to the amount of non-economic damages to be awarded, then proceed to Question 16.
16. Did Plaintiff David Ricotta engage in an activity protected by federal law?
<u>×</u> Yes No
At least five jurors must agree and sign his/her name below.
If five of six jurors answered, "Yes," then proceed to Question 17; otherwise, NOTIFY THE COURT THE JURY HAS REACHED A VERDICT.
17. Did Defendant County of Erie know Plaintiff David Ricotta was engaged in this activity?
At least five jurors must agree and sign his/her name below.
If five of six jurors answered, "Yes," then proceed to Question 18; otherwise, NOTIFY THE COURT THE JURY HAS REACHED A VERDICT.

Case 1:15-cv-01078-JJM Document 94 Filed 04/11/19 Page 8 of 10

18. Did Defendant County of Erie take an adverse employment action against Plaintiff Dav Ricotta?	1 d
<u>Yes</u> No	
At least five jurors must agree and sign his/her name below.	
•	
·	
l ·	
If five of six jurors answered, "Yes," then proceed to Question 19; otherwise, NOTIFY THE COURT THE JURY HAS REACHED A VERDICT.	ΗE
19. Was there a causal connection between the protected activity and the adverse employment action?	
YesNo	
At least five iurors must agree and sign his/her name below.	
-	
F	
If five of six jurors answered, "Yes," then proceed to Question 20; otherwise, NOTIFY TI COURT THE JURY HAS REACHED A VERDICT.	ΉE
20. Did Defendant County of Erie articulate a legitimate, non-retaliatory reason for taking adverse employment action against Plaintiff David Ricotta?	the
Yes No	
At least five jurors must agree and sign his/her name below.	

Case 1:15-cv-01078-JJM Document 94 Filed 04/11/19 Page 9 of 10

If five of six jurors answered, "Yes," then proceed to Question 21; otherwise, proceed to Question 22.
21. Did Plaintiff David Ricotta sufficiently show the non-retaliatory was both false and the retaliation was the real motive for taking the adverse employment action against him?
Yes No
At least five jurors must agree and sign his/her name below.
If five of six jurors answered, "Yes," then proceed to Question 22; otherwise, NOTIFY THE COURT THE JURY HAS REACHED A VERDICT.
22. What is the amount of economic damages, if any, suffered by Plaintiff David Ricotta directly caused by the adverse employment actions taken by Defendant County of Erie in retaliation of Plaintiff David Ricotta engaging in a protected activity?
\$
At least five jurors must agree and sign his/her name below.
Once five of six jurors have agreed to the amount of economic damages to be awarded, then proceed to Question 23.
23. What is the amount of non-economic damages, if any, suffered by Plaintiff David Ricotta directly caused by the adverse employment actions taken by Defendant County of Erie in retaliation of Plaintiff David Ricotta engaging in a protected activity?
\$

Case 1:15-cv-01078-JJM Document 94 Filed 04/11/19 Page 10 of 10

At least five jurors must agree and sign his/her name below.		
NOTIFY THE COURT THE JURY HAS RI	EACHED A VERDICT	